

COURT OF APPEALS FOR THE TENTH APPELLATE DISTRICT OF TEXAS

Rodney Allen Williams v. The State of Texas

No. 10-24-00149-CR · No. 10-24-00149-CR · Decided January 8, 2026

SUMMARY

The Tenth Court of Appeals of Texas affirmed Rodney Allen Williams’s convictions for aggravated sexual assault of a child and two counts of indecency with a child. The court held that the trial court did not abuse its discretion by excluding cross-examination concerning the complainant’s prior accusation against another person because there was no evidence that the prior accusation was false and therefore probative of motive or bias.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                           |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Court of Appeals for the Tenth Appellate District of Texas                                                                                                                                                                                                |
| WRITING FOR THE COURT | Matt Johnson; Chief Justice Matt Johnson; Justice Smith; Justice Harris                                                                                                                                                                                   |
| JURISDICTION          | Court of Appeals for the Tenth Appellate District of Texas                                                                                                                                                                                                |
| DECIDED               | January 8, 2026                                                                                                                                                                                                                                           |
| DOCKET                | 10-24-00149-CR                                                                                                                                                                                                                                            |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                  |
| PROCEDURAL POSTURE    | Williams appealed his convictions and sentences for one count of aggravated sexual assault of a child and two counts of indecency with a child, challenging the exclusion of cross-examination evidence concerning a prior accusation by the complainant. |
| STANDARD OF REVIEW    | The exclusion or admission of evidence is reviewed for abuse of discretion. An appellate court will not disturb the ruling if it falls within the zone of reasonable disagreement.                                                                        |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                           |
| PARTIES               | Rodney Allen Williams v. The State of Texas                                                                                                                                                                                                               |

TOPICS

- evidence
- impeachment
- criminal procedure
- standard of review
- appellate procedure

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by excluding evidence of C.F.'s prior accusation against Jarvis and prohibiting Williams from cross-examining C.F. about it.

## HOLDINGS

1. The trial court did not abuse its discretion by excluding evidence of C.F.'s prior accusation against Jarvis because Williams presented no evidence that the accusation was false, and therefore the evidence was not probative of a pattern of false accusations or of C.F.'s alleged motive to remove people from her mother's life.

## KEY QUOTATIONS

*“Under an abuse of discretion standard, an appellate court should not disturb the trial court’s decision if the ruling was within the zone of reasonable disagreement.” (4)*

*“There was no evidence that C.F.’s prior accusation against Jarvis was false.” (7)*

## FACTUAL BACKGROUND

The complainant, C.F., testified that Williams sexually assaulted her on multiple occasions when she was approximately nine years old while they lived together. Years later, C.F. disclosed the allegations to a school counselor, law enforcement, and a forensic interviewer. Before trial, the court conducted an in camera hearing concerning Williams's request to cross-examine C.F. about a prior sexual-abuse accusation against Jarvis, a later partner of C.F.'s mother; the court excluded the evidence because there was no evidence that the prior accusation was false.

## PROCEDURAL HISTORY

A jury found Williams guilty on all three counts, found the enhancement paragraphs true, and assessed life imprisonment on each count. The trial court sentenced him to life on each count and ordered the sentences to run consecutively. Williams appealed to the Tenth Court of Appeals, which affirmed.

## DISPOSITION

affirmed

## CASES CITED

- De La Paz v. State, 279 S.W.3d 336, 343 (Tex. Crim. App. 2009)
- McDonald v. State, 179 S.W.3d 571, 576 (Tex. Crim. App. 2005)
- Bigon v. State, 252 S.W.3d 360, 367 (Tex. Crim. App. 2008)
- Hammer v. State, 296 S.W.3d 555, 566 (Tex. Crim. App. 2009)
- Aleman v. State, No. 07-23-00142-CR, 2024 WL 952066, at \*3

- Lempar v. State, 191 S.W.3d 230, 239 (Tex. App.—San Antonio 2006, pet. ref'd)
- Lopez v. State, 18 S.W.3d 220, 226 (Tex. Crim. App. 2000)
- Biggers v. State, No. 10-16-00064-CR, 2017 WL 1540708, at \*4 (Tex. App.—Waco Apr. 26, 2017, no pet.)

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